



March 18, 2010

Attn: Terry Breyman
Council on Environmental Quality
722 Jackson Place, NW
Washington, DC 20503

**Re: Proposed National Objectives, Principles and Standards for
Water and Related Resources Implementation Studies**

Dear Mr. Breyman:

The Association of Metropolitan Water Agencies (AMWA) and the American Water Works Association (AWWA) are submitting these joint comments in response to the White House Council on Environmental Quality's (CEQ) December 2009 proposed *National Objectives, Principles and Standards for Water and Related Resources Implementation Studies*. The members of AMWA and AWWA together represent drinking water utilities of all sizes. Together our members serve more than 90% of the U.S. population. Many future federal water resources projects will affect, either directly or indirectly, the water resources planning of AMWA and AWWA member utilities.

AMWA and AWWA support the National Objective for water resources planning: "to develop water resources projects based on sound science that maximize net national economic, environmental, and social benefits." The planning principles that will serve to meet this objective are also laudable. How this objective will be measured is yet to be stated. We concluded from CEQ's notice that the forthcoming guidelines will outline the measures for meeting the National Objective and planning principles.

Therefore, AMWA and AWWA recommend that CEQ ensure that the planning process is fully transparent, by engaging the stakeholder community during the development of the guidelines. AMWA and AWWA also recommend the guidelines advocate for federal agencies to collaborate broadly, i.e., with stakeholders in the watershed that will be affected by a water resources project, especially community water systems.

As recommended in AMWA's comments of July 30, 2009, AMWA and AWWA again reiterate that the final planning principles, standards and guidelines recognize that maintaining adequate water supplies for the current population of the U.S., particularly in established communities, is paramount. The long-term viability and sustainability of the nation's water supply is integral to a viable national economy.

AMWA and AWWA agree that the principles and guidelines should "address risk and

uncertainty, including the effects of climate change and future development”. Moreover, as planning is an iterative process over time as described by CEQ in the document new information should be brought to bear. New data and information to assist planners in considering climate change impacts is continually emerging. Consequently, we recommend that the guidelines suggest coordination between local stakeholders in the watershed and the numerous independent federal climate efforts, including but not limited to the Department of Interior climate centers and the National Oceanic and Atmospheric Administration Climate Service. Collaboration with stakeholders and among these separate agency efforts will ensure the best and most recent information is included in the guidelines and shared with the user community.

Finally, AMWA and AWWA offer the following specific comments for the future Guideline’s Alternative Plans Section VI 1.6.1. (e): “*A range of measures that can, over time, balance water demand for various purposes with water availability should be considered...*” We recommend these measures be expanded to include the following:

- Measures that will improve water quality, including reducing salinity and total dissolved solids (TDS).
- Measures that will expand the cleanup of contaminated groundwater supplies.

As the development of new water supplies and the maintenance of current water supplies become more challenging, newer technologies and strategies such as desalination, water reuse, and water recycling are becoming more commonplace. Adding these measures will address the critical issue of improving water quality and will also promote sustainable water resource management through greater water conservation and reuse.

In summary, federal water resources development policy and the Principles and Guidelines should ensure the sustainability of the nation’s water supply for the current and future populations of established communities. It should also consider the current and future stresses on water supplies due to climate change and other ecological and environmental factors. It is critical that CEQ engage the stakeholder community during the development of the guidelines, especially stakeholders like community water systems who have a responsibility to protect public health by maintaining a safe and reliable source of drinking water. Documents as important as these guidelines warrant an opportunity for public comment.

If you have any questions about these comments, please contact Erica Brown of AMWA at 202-331-2820 or brown@amwa.net or Steve Via of AWWA at 202-326-6130 or svia@awwa.org.

Sincerely,

A handwritten signature in blue ink that reads "Diane VanDe Hei".

Diane VanDe Hei
AMWA Executive Director

A handwritten signature in blue ink that reads "Tom Curtis".

Tom Curtis
AWWA Deputy Executive Director

Cc: Michael Connor, Commissioner, Bureau of Reclamation
Peter Silva, Assistant Administrator for Water, EPA